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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	No.: CR-14-0196 CRB
	)	
Plaintiff,	)	NOTICE OF RELATED CASES IN A CRIMINAL
	)	ACTION
v.	)	

KWOK CHEUNG CHOW, a/k/a "Raymond	)
Chow", a/k/a "Hai Jai", a/k/a "Shrimpboy", et.	)
al.	)
	)
Defendant.	)

-----	)	No. CR-18-0152-SI
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UNITED STATES OF AMERICA,	)
	)
Plaintiff,	)
	)
v.	)
	)
JIN MING YAN,	)
	)
Defendant.	)

1 The government now gives notice to the Clerk of the Court pursuant to Criminal Local Rule 8-  
2 1(a).

3 Under Rule 8-1, a criminal action is related to another pending criminal action when (1) both  
4 actions concern one or more of the same defendants and the same alleged events, occurrences, or  
5 property, or (2) both actions appear likely to entail substantial duplication of labor if heard by different  
6 Judges or might create conflicts and create unnecessary expenses if conducted before different Judges.  
7 Here, the cases meet both of these criteria.

8 In the first case, CR-14-0196-CRB, entitled *United States v. Kwok Cheung Chow, et. al.*, a total  
9 of 29 defendants were charged and arrested on March 26, 2014, with a variety of offenses ranging from  
10 racketeering and firearms trafficking to money laundering, drug trafficking, and transportation of stolen  
11 liquor. One of the 29 defendants charged that day was an individual named Tina LIANG. LIANG  
12 recently pled guilty pursuant to a plea agreement to drug trafficking and stolen liquor trafficking  
13 charges, and was sentenced to 18 months in prison.

14 In the second case, CR-18-0152-SI, Jin Ming YAN is the lone defendant charged in a one-count  
15 information alleging tax evasion for the 2011 tax year. The government represents that this charge arose  
16 entirely out of the investigation in the *Chow* case that led to CR-14-0196-CRB. Specifically, during that  
17 investigation agents identified a house at 5555 Merritt Drive in Richmond, California, that Tina LIANG  
18 was suspected of using as a marijuana grow. Further investigation revealed that the house had been  
19 purchased by Bryan TILTON, another co-defendant in the *Chow* case, using cash provided by TILTON,  
20 Tina LIANG, and Jin Ming YAN. As a result of this evidence, agents conducted a financial  
21 investigation on YAN, searching his residence and interviewing him on the same day, March 26, 2014,  
22 that Tina LIANG, TILTON and the rest of the defendants in *Chow* were arrested. While the nature of  
23 the charge against YAN (tax evasion) is somewhat different from the charges against Tina LIANG,  
24 TILTON, and others involved in the *Chow* case, there is nevertheless some overlap in terms of events,  
25 occurrences and property.

26 The government expects the case against YAN in CR-18-0152-SI to resolve by way of a plea  
27 agreement. Nonetheless, there would be substantial duplication of labor if the case were not related to  
28

1 the *Chow* case. For example, the Court in the *Chow* case is already familiar with TILTON and Tina  
2 LIANG, having recently sentenced them both, and thus would be in a better position to evaluate YAN's  
3 relative culpability with respect to them. Moreover, if the plea agreement between the parties fell apart  
4 and YAN went to trial, it is conceivable that at least some witnesses from the *Chow* trial would be called  
5 to repeat testimony that they have already given in CR-14-0196-CRB. *See, e.g.*, Trial Testimony of IRS  
6 Special Agent Bryan Wong, Vol. 22, Dec. 17, 2015, at pgs. 4017-4020.

7  
8 DATED: April 16, 2018

Respectfully submitted,

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11 /s/  
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